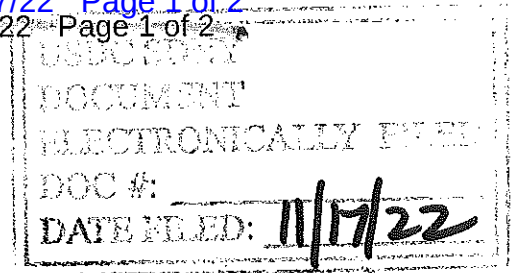


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November 16, 2022

VIA ECF

The Honorable Judith C. McCarthy
United States Magistrate Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

APPLICATION GRANTED


Hon. Paul E. Davidson, U.S.M.J.
11/17/22

Re: *United States v. Julio Alberto Taveras Abreu*
21 Mag. 11434

Dear Judge McCarthy:

Please recall that Peter Frankel, Esq., and I represent Mr. Julio Alberto Taveras Abreu in the above-referenced matter. Currently, Mr. Taveras Abreu is at liberty on a \$100,000 personal recognizance bond set before Your Honor on December 2, 2021. The terms of the bond are as follows: travel restricted to the Southern and Eastern Districts of New York and, upon application to the Court, to Pennsylvania for court appearances; the surrender of all travel documents to the United States Pretrial Services Agency ("Pretrial Services") and no new applications; supervision as directed by Pretrial Services; and GPS monitoring and home detention. On March 4, 2022, Magistrate Judge Paul E. Davidson modified Mr. Taveras Abreu's bail conditions to permit him to attend religious services at Iglesia Casa de Jehova in White Plains, New York, and to permit him to travel to our Manhattan office when necessary without needing to obtain pre-approval from Pretrial Services. On April 1, 2022, Your Honor modified Mr. Taveras Abreu's bail conditions to permit him to obtain employment. Mr. Taveras Abreu has remained in compliance with his bail conditions and maintains legal employment.

I write to respectfully request that Your Honor modify Mr. Taveras Abreu's bail conditions to remove the condition of home detention and impose a curfew to be determined by Pretrial Services.¹ I have consulted with A.U.S.A. Kevin Sullivan and Pretrial Officer Laura

¹ The condition of electronic location monitoring will remain in place.

U.S. v. Julio Alberto Taveras Abreu
The Honorable Judith C. McCarthy
November 16, 2022
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Gialanella, both of whom consent to this request. Thank you for your consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark I. Cohen", with a long horizontal stroke extending to the right.

Mark I. Cohen

MIC/gmf

Cc: A.U.S.A. Kevin Sullivan (via ECF)
U.S.P.T.S.O. Laura Gialanella (via email)
Mr. Julio Alberto Taveras Abreu (via email)